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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 KATHRYN MAYORGA, an individual

Case No.: 2:19-cv-00168-JAD-DJA

11
12 Plaintiff,

13 vs.

14 CRISTIANO RONALDO, individually,
15 Does I-XX and Roe Corporations I-XX;
16 Defendants.

17 **PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION**
18 **TO EXTEND TIME TO RESPOND TO DEFENDANT'S MOTION TO SEAL [ECF 113]**
19 **AND MOTION FOR SANCTIONS [ECF 112]**

20 COMES NOW plaintiff's reply to defendant's opposition to plaintiff's motion to extend
21 time to respond to defendant's motion to seal [ECF 113] and motion for sanctions [ECF 112].

22 This reply is made based upon the points and authorities attached hereto and the
23 pleadings and papers file with the court.
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1 Case No.: 2:19-cv-00168-JAD-DJA
2 Mayorga v. Ronaldo
3 plaintiff's reply to defendant's opposition
4 to plaintiff's motion to extend time to
5 respond to defendant's motion to
6 seal [ECF 113] and motion for sanctions [ECF 112]

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DATED this 7 day of July 2021.

STOVALL & ASSOCIATES



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Plaintiff's counsel declined to accept the defendant's offer for extension of time for filing the response to defendant's motion for terminating sanctions because the length of time offered by the defendant was not long enough. Perhaps plaintiff's counsel should have accepted, and then at the end of the agreed upon period filed a motion to extend time. Rather than go through that routine, plaintiff's counsel simply requested an extension based upon a realistic assessment of the situation he found himself at the time of the filing of the motion to extend time. That assessment appears accurate based upon the progress plaintiff's counsel has made to date in drafting the response to defendant's motion for terminating sanctions. Plaintiff's counsel will file the response prior to July 20, 2021 if possible. However, the request to extend time to file response was made to avoid any further requests for extensions.

1 Case No.: 2:19-cv-00168-JAD-DJA
2 Mayorga v. Ronaldo
3 plaintiff's reply to defendant's opposition
4 to plaintiff's motion to extend time to
respond to defendant's motion to
seal [ECF 113] and motion for sanctions [ECF 112]

5 DATED this 1 day of July 2021.

STOVALL & ASSOCIATES



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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 1st day of July 2021, service of the foregoing plaintiff's reply to defendant's opposition to plaintiff's motion to extend time to respond to defendant's motion to seal [ECF 113 and motion for sanctions [ECF 112] was made this date through the court's electronic filing system to the following:

CHRISTIANSEN TRIAL LAWYERS
710 S. 7th Street
Las Vegas, Nevada 89101
Attorneys for the defendant

/s/ Maria Hernandez
An employee of STOVALL & ASSOCIATES